

THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE: Duane McHenry	:	BK. NO. 17-00459 RNO
Debtor	:	
	:	
JPMorgan Chase Bank, NA	:	
Movant	:	CHAPTER 7
v.	:	
	:	
Duane McHenry	:	
Debtor	:	
and	:	
	:	
Robert P. Sheils, Jr.	:	
Trustee	:	

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**ANSWER TO MOTION OF JPMORGAN CHASE BANK, NA FOR RELIEF FROM  
AUTOMATIC STAY UNDER §362**

**NOW COMES** Respondent, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of JPMorgan Chase Bank, NA , for Relief from Automatic Stay Under §362, as follows:

1. Admitted.
2. Neither admitted nor denied. Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph two and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue after Debtor files his schedules and other statements.
3. Admitted.
4. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph four and strict proof thereof is demanded.

5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for March 24, 2017.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

9. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph nine and strict proof thereof is demanded.

**WHEREFORE**, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests the hearing on this motion be continued until after the 341 meeting currently scheduled for March 24, 2017.

Dated: February 23, 2017

/s/ Jill M. Spott

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